

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: 415 496 6723

Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF MARK D. FUHRIMAN
IN SUPPORT OF REORGANIZED
DEBTORS' SEVENTY-SIXTH OMNIBUS
OBJECTION TO CLAIMS WITH RESPECT
TO PROOF OF CLAIM NO. 80673 FILED BY
WILLIE & ORA GREEN**

[Related to Docket No. 10537]

1 I, Mark D. Fuhriman, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a senior principal geotechnical engineer with Kleinfelder, Inc. (“**Kleinfelder**”) in
5 Oakland, California. I submit this Declaration in support of the *Reorganized Debtors’ Seventy-Sixth*
6 *Omnibus Objection to Claims (No Liability / Passthrough Claims)* [Docket No. 10537] with respect to
7 Proof of Claim No. 80673 filed by Willie & Ora Green.

8 2. On January 24, 2022, I conducted a site visit to observe the driveway and garage floor at
9 2845 Magnolia Street in Oakland, California. I was accompanied by my colleague at Kleinfelder, John
10 Nicolini, and a representative of PG&E. Representatives for the Greens were also present, and the
11 Greens themselves observed our site visit through a contemporaneous video call with their
12 representatives.

13 3. The report attached hereto as **Exhibit A** (the “**Kleinfelder Report**”) constitutes the
14 observations, findings, and conclusions of the Kleinfelder team. Mr. Nicolini’s and my qualifications
15 are listed in Appendix A to the Kleinfelder Report. The Kleinfelder team’s response to the expert report
16 submitted by the Greens is set forth in Appendix C to the Kleinfelder Report.

17 4. If called upon to testify, I would testify competently to the facts set forth in this
18 Declaration and the observations, findings, and conclusions set forth in the Kleinfelder Report. I am
19 authorized to submit this Declaration and the Kleinfelder Report on behalf of the Reorganized Debtors.

20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
21 correct to the best of my knowledge, information, and belief. Executed this 25th day of March, 2022.

22 /s/ Mark D. Fuhriman
23 Mark D. Fuhriman, P.E., G.E.
24
25
26
27
28